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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WMCV PHASE 3, LLC, a Delaware limited liability company,

Case No.: 2:10-cv-00661-RCJ-RJJ

Plaintiff,

vs.

DEFENDANT GLOBAL ACCENTS, INC.’
MOTION FOR ATTORNEYS’ FEES AND
COSTS PURSUANT TO RULE 54(d) AND
L.R. 54-16; AMEND JUDGMENT FOR
AWARD OF FEES, EXPENSES, AND
COSTS

SHUSHOK & MCCOY, INC., a Texas corporation; MATTHEW J. TRAVIS, an individual; MATT TURNER, an individual; RICHARD BIRDWELL, an individual; GLOBAL ACCENTS, INC., a California corporation; COUTURE INTERNATIONAL, INC., a Quebec corporation; DOES I through X, inclusive; ROE ENTITIES I through X, inclusive,

Defendants.

And Related Claims

Pursuant to Rule 54(d) of the Federal Rules of Civil Procedure and L.R. 54-16, Defendant Global Accents, Inc. (“Global Accents”), by and through its counsel of record at the law firm of MICHAEL B. LEE, P.C., hereby respectfully submits the following Motion for Attorneys’ Fees and Costs Pursuant to Rule 54(d) and L.R. 54-16; Amend Judgment For Award of Fees, Expenses, and Costs (“Motion”) related to this action. This Motion is based on the Court’s Order Entering Final Judgment, the papers and pleadings on file in this case, the accompanying Memorandum of Points and Authorities, the attached Declaration of Michael B. Lee, and attached exhibits. Plaintiff WMCV PHASE 3, LLC. is referred to as “Plaintiff,” “WMCV,” or “World Market Center.”

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1 **I. INTRODUCTION**

2 **A. Overview**

3 Global Accents respectfully requests that this Honorable Court award it attorneys' fees,
4 costs, expenses, interest related to invoiced attorneys' fees, and fees for this Motion in the
5 amount of (1) \$70,585.72 or (2) \$83,201.42. Both are based on the same costs, expenses, and
6 interest with the differing variable being the attorneys' fees. The first is based on the invoiced
7 attorneys' fees. The second is based on a recalculated attorneys' fees at a reasonable rate of
8 \$230 / hour without write offs. Global Accents' counsel provided courtesy discounts to Global
9 Accents that were not for the benefit of Plaintiff. Furthermore, Global Accents attempted to
10 resolve this matter by way of Offer of Judgment on July 27, 2011, at the time of the settlement
11 conference, and again before the trial of this matter; however, Plaintiff rejected each attempt to
12 do so. As such, good cause appears to award Global Accents' \$83,201.42 for attorneys' fees,
13 costs, expenses, and interest on the invoiced fees.

14 **B. Statement of Facts/Procedure**

15 The underlying matter arose out of a landlord tenant dispute regarding the payment of
16 rent, and the fraud committed by the former collection agency, Shushok & McCoy, Inc.
17 ("Shushok"), employed by Plaintiff. The substantive issue of fact related to the scope of
18 Shushok's authority to enter into a settlement agreement with Global Accents on behalf of
19 Plaintiff, and whether Global Accents' reliance was both objectively and subjective reasonable
20 that Shushok had such authority. This Honorable Court found that, while Shushok did not have
21 actual authority to enter into the Lease Termination and Release Agreement ("Global Accents
22 Release"), Global Accents "subjectively believed that Shushok had authority to act for WMCV
23 by entering into an agreement on WMCV's behalf . . . [and] that Global's subjective belief was
24 objectively reasonable." (ECF No. 209 at 9:20-22.)

25 On December 27, 2013, this Honorable Court issued an Order on the bench trial of this
26 matter in favor of judgment for Global Accents' counterclaim "for its breach of contract claim
27 against [Plaintiff]" and found that Global Accents was "entitled to a damages award in an
28 amount equivalent to reasonable attorneys' fees, costs, and expenses for this action." *Id.* at

16:19-22.) Additionally, this Court found for Global Accents on all claims raised by Plaintiff, resulting in the dismissal of all of Plaintiff's claims against Global Accents. *Id.* at 17:1-3. Paragraph 9(a) of the Global Accent Release specified that "[i]f any is brought to enforce or interpret the terms of this Agreement or any obligations set out in this Agreement, the prevailing party, either by way of settlement or by final judgment, is entitled to recover its reasonable attorneys' fees, costs, and expenses."

7 **II. DISCUSSION**

8 Global Accents is entitled to attorneys' fees, costs, and expenses by way of the Judgment in this matter. In support, Part A sets forth the procedural rules and substantive law related to attorneys' fees and costs. Part B references the authority for the award of attorneys' fees, costs, and expenses. Part C demonstrates the requirements under LR 54-16. Finally, Part D requests the recalculation of attorneys' fees and costs and the justification for doing as such.

13 **A. Standards**

14 1. Federal Rule of Civil Procedure 54(d)

15 Pursuant to Federal Rule of Civil Procedure 54(d), a prevailing party may move for attorneys' fees and costs. Under 54(d)(1), costs, "other than attorney's fees[,] should be allowed to the prevailing party." As to attorneys' fees, the prevailing party may move for them and related nontaxable expenses by way of motion. *Id.* at 54(d)(2)(A). The prevailing party must: (i) 19 filed the motion no later than 14 days after the entry of judgment; (ii) specify the judgment and the statute, rule, or other grounds entitling the movant to the award; (iii) state the amount sought or provide a fair estimate of it; and (iv) disclose, if the court so orders, the terms of any agreement about fees for the services for which the claim is made. *Id.* at 54(d)(2)(B)(i)-(iv).

23 Nevada follows the American Rule that a party is not entitled to attorneys' fees unless authorized by a rule, statute, or contract. *Frank Settemeyer & Sons, Inc. v. Smith & Harmer, Ltd.*, 197 P.3d 1051, 1060 (Nev. 2008). When a contract provides for attorneys' fees, the Ninth Circuit Courts of Appeals ("Ninth Circuit") interprets the attorneys' fee agreement according to the parties' stated choice-of-law preference. *Port of Stockton v. W. Bulk Carrier KS*, 371 F.3d 1119, 1121 (9th Cir. 2004) (citing *Chan v. Soc'y Expeditions, Inc.*, 123 F.3d 1287, 1296-97 (9th

1 Cir.1997)). Nevada permits an award of attorneys' fees under the plain language of the
 2 agreement, which also includes both trial and appellate work. *Musso v. Binick*, 104 Nev. 613,
 3 614-15, 764 P.2d 477 (1988). Plain language of contracts give the contractual right to recover all
 4 reasonable fees that it incurred in litigating a dispute, regardless of whether the underlying cause
 5 of action sounded in tort or contract. *Santisas v. Goodin*, 17 Cal.4th 599, 71 Cal.Rptr.2d 830,
 6 951 P.2d 399, 405 (Cal.1998) ("If a contractual attorney fee provision is phrased broadly enough
 7 ... it may support an award of attorney fees to the prevailing party in an action alleging both
 8 contract and tort claims").

9 2. L.R. 54.16

10 Under the local rules for the District of Nevada, "[w]hen a party is entitled to move for
 11 attorney's fees, such motion shall be filed with the Court and served within fourteen (14) days
 12 after entry of the final judgment or other order disposing of the action." L.R. 54.16(a). The
 13 motion for attorney's fees must, in addition to those matters required by Federal Rule of Civil
 14 Procedure 54(d)(2)(B), include the following: (1) A reasonable itemization and description of
 15 the work performed; (2) An itemization of all costs sought to be charged as part of the fee award
 16 and not otherwise taxable pursuant to LR 54-1 through 54-15; (3) A brief summary of: (A) The
 17 results obtained and the amount involved; (B) The time and labor required; (C) The novelty and
 18 difficulty of the questions involved; (D) The skill requisite to perform the legal service properly;
 19 (E) The preclusion of other employment by the attorney due to acceptance of the case; (F) The
 20 customary fee; (G) Whether the fee is fixed or contingent; (H) The time limitations imposed by
 21 the client or the circumstances; (I) The experience, reputation, and ability of the attorney(s); (J)
 22 The undesirability of the case, if any; (K) The nature and length of the professional relationship
 23 with the client; (L) Awards in similar cases; and, (4) Such other information as the Court may
 24 direct. *Id.* at 54-16(b). The attorney responsible for the billings must authenticate the billings by
 25 way of affidavit, confirming that the bill has been reviewed and edited and that the fees and costs
 26 charged are reasonable. *Id.* at 54-16(c).

27 "If no opposition is filed, the Court may grant the motion. If an opposition is filed, it shall
 28 set forth the specific charges that are disputed and state with reasonable particularity the basis for

1 such opposition. The opposition shall further include affidavits to support any contested fact.”
 2 *Id.* at 54-16(e). The court may rule on the motion without a hearing unless specifically
 3 requested. *Id.* at 54-16(f).

4
 5 **B. Plain Language of the Global Accents Release Awards Reasonable Attorneys’ Fees, Costs, and Expenses**

6 Global Accents is entitled to recovery of its reasonable attorneys’ fees, costs, and
 7 expenses pursuant to the Global Accents Release. Paragraph 9(a) of the Global Accent Release
 8 specified that “[i]f any is brought to enforce or interpret the terms of this Agreement or any
 9 obligations set out in this Agreement, the prevailing party, either by way of settlement or by final
 10 judgment, is entitled to recover its reasonable attorneys’ fees, costs, and expenses.” The attached
 11 declaration of counsel illustrates the reasonable attorneys’ fees, costs, and expenses incurred by
 12 Global Accents in defending this action and the prosecution of the counterclaim. Ex. A.

13 **C. Information Required For Attorneys’ Fees Pursuant to Local Rule 54.16**

14 a. *Itemization and Description of the Work Performed:*

15 Exhibit A-2 to the Lee Declaration summarizes the work performed by Global Accents’
 16 counsel. Global Accents seeks reimbursement of a total of \$49,510.80 in attorneys’ fees.
 17 Exhibit A-1 to the Declaration are the invoices from Michael B. Lee, P.C., and Exhibit A-3 are
 18 the invoices from Kravitz, Schnitzer, Sloane & Johnson, Chtd. (“KSSJ”).

19 b. *Itemization of Non-taxable Costs Sought as Part of Fee Award:*

20 The Lee Declaration itemizes the non-taxable costs. Global Accents seeks an award of
 21 non-taxable costs in the total amount of \$1,490.00. As to Expenses, Exhibit B lists the amount
 22 of expenses incurred by Global Accents. A true and correct copy of the Declaration of Parham
 23 Partielli is attached as **Exhibit B**.

24 c. *Nature of the Case:*

25 The nature of the case is identified above.

26 d. *Difficulty of the Case:*

27 The case was of moderate difficulty, legally, but the difficulty was increased by
 28 Plaintiff’s conduct and unnecessary attacks on Parham Partielli, the manager of Global Accents.

1 e. Results Obtained and Amount Involved:

2 This Honorable Court issued an Order on the bench trial of this matter in favor of
3 judgment for Global Accents' counterclaim "for its breach of contract claim against [Plaintiff]"
4 and found that Global Accents was "entitled to a damages award in an amount equivalent to
5 reasonable attorneys' fees, costs, and expenses for this action. *Id.* at 16:19-22.

6 f. Time and Labor Required:

7 The case involved a large amount of time and labor as a result of the various pleadings,
8 motions filed in this case, the bench trial and related briefs, and the post-trial briefs. Global
9 Accents filed an Answer, and a counterclaim and third party claims. Additionally, Global
10 Accents opposed Plaintiff's motions noted above, filed various discovery motions, analyzed
11 documents produced in discovery, attended depositions, filed a motion for summary judgment,
12 substantial trial briefs and motions in limine, and the instant motion.

13 g. Novelty and Difficulty of the Questions Involved:

14 The fundamental legal issues presented were not novel, but discerning the legal issues, if
15 any, raised by Plaintiff was exceedingly difficult, given Plaintiff's bullish approach to presenting
16 its arguments, the conclusory allegations contained in most, if not all, of Plaintiff's motions, the
17 general lack of evidence in support, and Plaintiff's unnecessary attacks on Global Accents and
18 Mr. Partielli.

19 h. Skill Requisite to Perform the Legal Services Properly:

20 A moderate degree of skill was necessary to perform the legal services properly. As
21 stated above, the issue of landlord tenant law coupled with agency liability created additional
22 levels of complexity to this case.

23 i. Preclusion of Other Employment by the Attorneys Due to Acceptance of
24 the Case:

25 During the time period in which this case was pending, Global Accents' counsel's law
26 firms were not precluded from taking on additional work. However, during the time for the trial,
27 Global Accents' counsel could not work on other case and had to devote time and attention to
28 this case, as Global Accents' counsel only has a single attorney handling cases and the practice.

j. The Customary Fee:

Global Accents' counsel charged its customary hourly rates as agreed to by Global Accents and Global Accents' predecessor firm - KSSJ. Notably, Mr. Lee was the lead counsel while working at KSSJ and maintained this position once he began working at Michael B. Lee, P.C.

k. Whether the Fee Is Fixed or Contingent:

The initial charge for the reply brief to a motion for summary judgment was on fixed fee of \$1,500. Thereafter, the fee charged was based on the number of hours expended. It was neither a fixed nor a contingent fee arrangement. The costs were charged at a fixed rate of \$50 per month.

l. Time Limitation Imposed by the Client or the Circumstances:

Global Accents did not impose strict time limitations. However, Global Accents was being irreparably harmed by Plaintiff's prosecution of this matter and the constant disruptions to Mr. Partielli's, the manager, life and devotion to other activities.

m. The Experience, Reputation and Ability of the Attorneys Involved:

Although reputation and ability is perhaps for other to judge, Global Accents believes that the attorneys involved in this case have excellent reputations and are highly skilled. Lead attorney Mr. Lee was formerly a senior associate at KSSJ and now the managing member of Michael B. Lee, P.C. He has 7 years of litigation experience and has litigated several cases. He has also practiced before the Ninth Circuit, the United States Supreme Court, and the Nevada Supreme Court having obtained three published opinions (two in the Nevada Supreme Court and one in the Ninth Circuit). Mr. Lee graduated from the University of Nevada, Las Vegas School of Law in 2006 in the top 25% of his class, has an AV rating from Martindale Hubble, and also has several awards from Nevada Business Magazine, Super Lawyers Magazine, and various other publications for being a top attorney in Southern Nevada.

n. The Undesirability of the Case, if any:

The case would not be characterized as undesirable.

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o. *The Nature and Length of the Professional Relationship with the Client:*

Mr. Lee has represented Global Accents since it retained KSSJ.

p. *Awards in Similar Cases:*

There are no other known awards at this time, but Plaintiff has several ongoing cases in both state and federal court.

D. Global Accents Should Be Awarded Full Attorneys' Fees

Global Accents attempted to resolve this matter with Plaintiff without success. On July 27, 2011, Global Accents made an offer of judgment for \$5,000.00 to Plaintiff. A true and correct copy of the Offer of Judgment is attached as **Exhibit C**. Previously, at the settlement conference, Global Accents attempted to resolve this matter with Plaintiff without success. Prior to trial, Global Accents' counsel again attempted to resolve this matter with both sides bearing their fees and costs. A true and correct copy of the Lee/Gerber E-Mail dated November 15, 2012 is attached as **Exhibit D**. At all stages, Plaintiff rejected each of these settlement offers in bad faith.

In light of Global Accents' good faith attempts to resolve this matter without having to go to trial, Global Accents respectfully requests that its counsel be fully compensated in this matter. As to KSSJ, it requests that it receive a blended rate of \$230 / hour for its time of 118.60 hours for a total of \$27,278.00 in time. As to Michael B. Lee, P.C., it requests that he receive the same rate as KSSJ for a total of \$40,974.50. The total amount of reasonable attorneys' fees requested is \$68,252.50. As to the discounts provided by Global Accents' counsel, those were for the benefit of Global Accents that should not inure to Plaintiff. Global Accents requests that its counsel receive reasonable compensation for their services in this matter.

Finally, Global Accents should be reimbursed for the interest on the monies it had to pay. Prime interest rate is 3.25%. Pursuant to Nevada Revised Statute § 17.130(2), Nevada tacks on an additional 2% to the prime rate. As such, Global Accents respectfully requests to recover interest of 5.25% from the date of filing (March 26, 2010) on its attorneys' fees of \$49,510.80 for a total award of interest of \$9,848.92. A true and correct copy of the interest calculation is attached as **Exhibit E**. Global Accents is reasonable in asking for interest on the invoices fees

only, and not the reassessed fees based on the time expended and a reasonable rate.

III. CONCLUSION

Based on the foregoing, Global Accents respectfully requests that this Honorable Court award it attorneys' fees in the amount of \$68,252.50, costs in the amount of \$1,490.00, expenses in the amount of \$1,110.00, and statutory interest on the invoiced attorneys' fees in the amount of \$9,848.92 for a total award of \$80,701.42. As to projected attorneys' fees related to the Motion, Global Accents requests an additional \$2,500.00. This is a total of \$83,201.42.

Dated this 7 day of January, 2014.

MICHAEL B. LEE, P.C.

/s/ Michael Lee

MICHAEL B. LEE, ESQ. (NSB 10122)

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mike@mblnv.com

Attorneys for Defendant Global Accents, Inc.

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CERTIFICATE OF SERVICE

In accordance with Fed. R. Civ. P. 5, I hereby certify that on the 7 day of January, 2014, a copy of the foregoing **DEFENDANT GLOBAL ACCENTS, INC.' MOTION FOR ATTORNEYS' FEES AND COSTS PURSUANT TO RULE 54(d) AND L.R. 54-16; AMEND JUDGMENT FOR AWARD OF FEES, EXPENSES, AND COSTS** was served on the parties via CM-ECF filing:

Terry A. Coffing, Esq.
Jason Gerber, Esq.
Marquis & Aurbach
10001 Park Run Drive
Las Vegas, NV 89145
Attorneys for Plaintiff

/s/ Michael B. Lee

An employee of Michael B. Lee, P.C.

MICHAEL B. LEE, P.C.
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Exhibit A

Exhibit A

DECLARATION OF MICHAEL B. LEE

Michael B. Lee, being first duly sworn, deposes and says that he has personal knowledge and is competent to testify to the facts below. The facts stated herein are true to the best of my own personal knowledge, except for those facts stated upon information and belief, and as to those facts, I believe them to be true.

1. I am an attorney duly licensed to practice law in Nevada, California, the United States District Court, District of Nevada, the Ninth Circuit Court of Appeals ("Ninth Circuit"), and the United States Supreme Court.

2. I previously worked as an associate with Kravitz, Schnitzer, Sloane, & Johnson, Chtd. ("KSSJ") before starting Michael B. Lee, P.C. During all times, I was an attorney retained by Global Accents to defend the claims against it. During all times, Gary E. Schnitzer was also an attorney retained by Global Accents to defend the claims against it. I have personal knowledge of the facts set forth herein, except where otherwise indicated. As to those facts, I have a good faith basis for the representations.

3. I am making this Declaration in support of the Motion for attorneys' fees and costs for Global Accents. Pursuant to LR 54-16(c), I was responsible for the attached billings in the case and confirming that the bill has been reviewed and edited and that the fees and costs charged were reasonable.

4. Global Accents incurred a total of \$32,009.30 in attorneys' fees related to the defense of the claims in this matter to December 2013. A true and correct copy of invoices for this matter is attached as **Exhibit A-1**. Michael B. Lee, P.C. charged an hourly rate of \$200 per hour with a total time of 178.15 hours. A true and correct copy of an excel sheet summary is attached as **Exhibit A-2**. Michael B. Lee, P.C. agreed to a flat charge of \$1,500 for the initial response to the motion for summary judgment, but had a contractual agreement for an hourly rate thereafter. As to a subsequent motion in limine, the firm agreed to write off time related to the reply brief and connected issues. Finally, as a courtesy to the client, the firm did not charge for ordinary communications with client unless it justified by the amount of time.

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5. KSSJ charged an hourly rate of \$210 per hour for associates \$250 for partners. It had a total time of 118.60 hours for a total of \$17,500.00. A true and correct copy invoices for this matter is attached as **Exhibit A-3**. The firm agreed to write off \$6,126.00 in time, and various billing entries were non-billable if related to client communications. Together, the total fee for attorneys was **\$46,870.80**.

6. As to costs, they contained the following:

Service of Process/Subpoenas	\$140.00
Flat Fee for Office Costs	\$50 / month (11/11 – 01/14) = \$1,350.00
TOTAL	\$1,490.00

7. The Offer of Judgment attached as Exhibit C is a true and correct copy.

8. The Lee/Gerber E-Mail dated November 15, 2012 attached as Exhibit D is a true and correct copy of that e-mail chain.

9. The print out of the interest calculation attached as Exhibit E is a true and correct copy.

10. I declare under the penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

FURTHER DECLARANT SAYETH NAUGHT

DATED this 8 day of January, 2014.



DECLARANT

MICHAEL B. LEE, P.C.
2000 SO. EASTERN AVENUE
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TEL – (702) 477.7030; FAX – (702) 477.0096

Exhibit A-1

Exhibit A-1

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 7**Invoice Date:** 11/15/2011**Due Date:** 11/15/2011**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
10/31/2011	(NO CHARGE TO CLIENT) Draft multiple e-mails with D. Partielli regarding [REDACTED]	0.5	0.00	0.00
10/31/2011	(NO CHARGE TO CLIENT) Review and Respond to multiple e-mails from G. Schntizer (former attorney) regarding [REDACTED]	0.5	0.00	0.00
10/31/2011	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding stipulation to enlarge time file response to counter motion and reply to response	0.1	0.00	0.00
10/31/2011	Review and Respond to multiple e-mails from M. Cecil (attorney for Plaintiff) regarding future handling	0.5	0.00	0.00
11/1/2011	(NO CHARGE TO CLIENT) Review and Respond to multiple e-mails with KSSJ regarding [REDACTED]	0.5	0.00	0.00
11/1/2011	(NO CHARGE TO CLIENT) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.3	0.00	0.00
11/3/2011	Review and Respond to multiple e-mails with M. Cecil (attorney for Plaintiff) regarding stipulation and future handling	0.5	0.00	0.00
11/3/2011	Review and Respond to multiple e-mails with M. Cecil (attorney for Plaintiff) regarding future handling and representation	0.3	0.00	0.00
11/7/2011	Review e-mail from G. Schnitzer regarding [REDACTED]	0.2	0.00	0.00
11/7/2011	(NO CHARGE TO CLIENT) Review and Respond to e-mail with D. Partielli regarding retainer [REDACTED]	0.3	0.00	0.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 7**Invoice Date:** 11/15/2011**Due Date:** 11/15/2011**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
11/7/2011	Telephone call with M. Cecil (attorney for Plaintiff) regarding agreement to provide extension to file papers	0.3	0.00	0.00
11/8/2011	(NO CHARGE TO CLIENT) Telephone call with D. Partielli regarding retainer [REDACTED]	0.5	0.00	0.00
11/8/2011	Telephone call with G. Schnitzer regarding [REDACTED]	0.2	0.00	0.00
11/8/2011	Telephone call with M. Cecil (attorney for Plaintiff) regarding extension to file papers	0.2	0.00	0.00
11/8/2011	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding extension to file papers	0.2	0.00	0.00
11/8/2011	Draft e-mail to G. Schnitzer regarding status [REDACTED]	0.2	0.00	0.00
11/8/2011	Review e-mail from M. Cecil (attorney for Plaintiff) regarding agreement to enlarge response time	0.2	0.00	0.00
11/8/2011	Draft Stipulation to enlarge time to file response	0.3	0.00	0.00
11/12/2011	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding status on stipulation to enlarge time to file response	0.2	0.00	0.00
11/14/2011	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding status of stipulation to enlarge time	0.2	0.00	0.00
11/15/2011	Review Order from Court regarding granting of request for enlargement in time	0.2	0.00	0.00
Total				\$0.00
Payments/Credits				\$0.00
Balance Due				\$0.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 26**Invoice Date:** 12/16/2011**Due Date:** 12/16/2011**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
11/18/2011	Review notice of electronic filing regarding M. Turner	0.1	0.00	0.00
11/22/2011	Review minute order regarding continuation of hearing for motion to withdraw	0.2	0.00	0.00
11/22/2011	Review minute order continuing hearing today to another date	0.2	0.00	0.00
11/29/2011	Travel to/from Federal Court House to attend Motion to Withdraw (1.0) and Attend (.5)	1.5	0.00	0.00
11/29/2011	(No charge to client) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
11/29/2011	Draft Declaration of D. Partielli regarding retention of Michael B. Lee, P.C.	1	0.00	0.00
12/1/2011	Review minute order from court regarding KSSJ's Motion to Withdraw	0.2	0.00	0.00
12/7/2011	Draft Motion to Substitute Attorneys	1	0.00	0.00
12/7/2011	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding inquiry related to past acceptance of claims negotiated by SMI	0.4	0.00	0.00
12/7/2011	Draft e-mail to W. Urga (attorney for Couture) regarding inquiry related to past acceptance of claims negotiated by SMI and discovery plans	0.3	0.00	0.00
12/12/2011	Review Opposition, Counter-Motion, and Draft Reply and Response	5	0.00	0.00
12/12/2011	(NO CHARGE TO CLIENT) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
12/13/2011	Multiple telephone calls and e-mail with D. Partielli regarding Reply brief	1	0.00	0.00
12/13/2011	Finalize/Format Reply brief	0.3	0.00	0.00
12/13/2011	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding Reply Brief and potential resolution through new tenant	0.3	0.00	0.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 26**Invoice Date:** 12/16/2011**Due Date:** 12/16/2011**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
12/13/2011	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding potential settlement	0.2	200.00	40.00
12/16/2011	(NO CHARGE TO CLIENT) Telephone call with D. Partielli regarding [REDACTED]	0.2	0.00	0.00
12/16/2011	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding potential resolution	0.2	200.00	40.00
12/16/2011	Review and Respond to multiple e-mails from M. Cecil (attorney for Plaintiff) regarding potential resolution	0.5	200.00	100.00
Total				\$180.00
Payments/Credits				\$0.00
Balance Due				\$180.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 43**Invoice Date:** 1/15/2012**Due Date:** 1/15/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
1/10/2012	Review and Respond to e-mail from M. Cecil requesting additional time to file reply brief	0.2	200.00	40.00
1/10/2012	Review notice of filing of stipulation for additional time	0.1	200.00	20.00
Total				\$60.00
Payments/Credits				\$0.00
Balance Due				\$60.00

Serviced	Description	Hours	Rate	Amount
1/19/2012	(NO CHARGE TO CLIENT) Review and Respond to multiple e-mails with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
2/6/2012	Review minute order setting this matter for settlement conference	0.1	200.00	20.00
2/6/2012	(NO CHARGE TO CLIENT) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
<div> <div>Total</div> <div>\$20.00</div> </div>				
		<div> <div>Payments/Credits</div> <div>\$0.00</div> </div>		
<div> <div>Balance Due</div> <div>\$20.00</div> </div>				

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 67**Invoice Date:** 3/2/2012**Due Date:** 3/2/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
2/21/2012	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding authorization to speak with Danny directly	0.2	200.00	40.00
2/21/2012	(NO CHARGE TO CLIENT) Review and Respond to multiple e-mails with D. Partielli regarding [REDACTED]	0.5	0.00	0.00
Total				\$40.00
Payments/Credits				\$0.00
Balance Due				\$40.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 89**Invoice Date:** 4/15/2012**Due Date:** 4/15/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
3/7/2012	(NO CHARGE TO CLIENT) Review and Respond to e-mail from D. Partielli regarding status [REDACTED]	0.2	0.00	0.00
4/12/2012	(NO CHARGE TO CLIENT) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
<hr/>				
Total				\$0.00
<hr/>				
Payments/Credits				\$0.00
<hr/>				
Balance Due				\$0.00
<hr/>				

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 99**Invoice Date:** 5/1/2012**Due Date:** 5/1/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
4/30/2012	Review and Respond to multiple e-mails from all counsel regarding changing date for settlement conference	0.5	200.00	100.00
Total				\$100.00
			Payments/Credits	\$0.00
Balance Due				\$100.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 105**Invoice Date:** 6/4/2012**Due Date:** 6/4/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
5/1/2012	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding rescheduling settlement conference	0.2	200.00	40.00
5/8/2012	Review Minute Order from Court regarding resetting of settlement conference	0.2	200.00	40.00
5/10/2012	Review Notice of Filing from Court re: Affidavit	0.1	200.00	20.00
5/10/2012	Review Notice of Change in Settlement Conference filing	0.1	200.00	20.00
5/22/2012	Review notice of filing	0.2	200.00	40.00
5/23/2012	Review notice of filing	0.2	200.00	40.00
5/23/2012	Travel to/from 333 Las Vegas Blvd. South to attend settlement conference and Attend	4	200.00	800.00
5/28/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding future [REDACTED]	0.2	0.00	0.00
5/28/2012	Review minutes from settlement conference	0.2	200.00	40.00
5/30/2012	Review notice from District Court regarding pretrial order	0.1	200.00	20.00
5/30/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
Total				\$1,060.00
			Payments/Credits	\$0.00
Balance Due				\$1,060.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 111**Invoice Date:** 6/15/2012**Due Date:** 6/15/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
6/4/2012	Review and Respond to e-mail from M. Cecil (attorney for WMCV) regarding potential settlement	0.3	200.00	60.00
6/5/2012	Telephone call with M. Cecil (attorney for WMCV) regarding potential settlement	0.5	200.00	100.00
6/5/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/6/2012	Review electronic filing notice regarding returned mail	0.1	200.00	20.00
6/14/2012	Review and Respond to e-mail from M. Cecil (attorney for WMCV) regarding trial availability	0.2	200.00	40.00
Total				\$220.00
			Payments/Credits	\$0.00
Balance Due				\$220.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 36**Invoice Date:** 1/3/2012**Due Date:** 1/3/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
12/20/2011	(NO CHARGE TO CLIENT) Review e-mail from D. Partielli regarding [REDACTED]	0.2	0.00	0.00
12/20/2011	Draft e-mail to M. Cecil (attorney for WMCV) regarding contact with client for lease negotiations	0.2	200.00	40.00
12/20/2011	Review and Respond to e-mail from M. Cecil (attorney for WMCV) regarding negotiations and request for extension	0.2	200.00	40.00
12/20/2011	Review Order terminating G. Schnitzer from case	0.2	200.00	40.00
12/21/2011	Review Notice from court regarding filing of response and reply, refileing them as two separate documents	0.2	200.00	40.00
12/26/2011	(NO CHARGE TO CLIENT) Review and Respond to multiple e-mails with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
12/26/2011	Draft e-mail to M. Cecil (attorney for WMCV) regarding authorization to communicate directly with D. Partielli	0.2	200.00	40.00
Total				\$200.00
Payments/Credits				\$0.00
Balance Due				\$200.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 117**Invoice Date:** 7/2/2012**Due Date:** 7/2/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
6/19/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/20/2012	Review Plaintiff's Production of Documents (3000 documents) in preparation to complete Joint Pre-Trial Order	6	200.00	1,200.00
6/20/2012	Complete Joint Pre-Trial Order	2	200.00	400.00
6/20/2012	Draft e-mail to all counsel regarding Joint Pre-Trial Order	0.2	200.00	40.00
6/20/2012	Review and Respond to multiple e-mails from B. Urga (attorney for Couture) regarding planned motion in limine on estoppel	0.5	200.00	100.00
6/20/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.5	0.00	0.00
6/20/2012	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding trial [REDACTED]	0.2	0.00	0.00
6/21/2012	Review and Respond to multiple e-mails from B. Urga (attorney for Couture) regarding planned motion in limine on estoppel	0.2	200.00	40.00
6/21/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.5	0.00	0.00
6/21/2012	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding trial [REDACTED]	0.5	0.00	0.00
6/21/2012	Telephone call with M. Cecil (attorney for Plaintiff) regarding Joint Pre-Trial Order	0.75	200.00	150.00
6/22/2012	Multiple telephone calls with all counsel regarding Pre-Trial Order	0.5	200.00	100.00
6/22/2012	Review and Respond to multiple e-mails from all counsel regarding Pre-Trial Order	0.5	200.00	100.00
6/25/2012	Review notice of electronic filing regarding Joint Pre-Trial Order	0.1	200.00	20.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 117**Invoice Date:** 7/2/2012**Due Date:** 7/2/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
6/25/2012	Review e-mail from M. Cecil (attorney for Plaintiff) regarding E. Dominguez	0.1	200.00	20.00
Total				\$2,170.00
			Payments/Credits	\$0.00
Balance Due				\$2,170.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 143**Invoice Date:** 10/18/2012**Due Date:** 10/18/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
10/8/2012	Review Pre-Trial Order in preparation to Draft Motion in Limine regarding admission of designated documents	0.5	200.00	100.00
10/8/2012	Review documents for inclusion in motion in limine for admission prior to trial	2.5	200.00	500.00
10/8/2012	Review case law and other authority related to admission of documents and relevance	1	200.00	200.00
10/8/2012	Draft Motion in Limine	6	200.00	1,200.00
10/8/2012	Draft Declaration regarding exhibits	0.5	200.00	100.00
10/8/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
10/8/2012	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
10/9/2012	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
10/10/2012	Pacer Charge to Review Motion in Limine		3.00	3.00
Total				\$2,103.00
			Payments/Credits	\$0.00
Balance Due				\$2,103.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 125**Invoice Date:** 8/1/2012**Due Date:** 8/1/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
7/2/2012	(NO CHARGE) Review and Respond to multiple e-mails with D. Partielli regarding [REDACTED]	0.5	0.00	0.00
7/3/2012	(NO CHARGE) Review and Respond to multiple e-mails with D. Partielli regarding [REDACTED]	0.5	0.00	0.00
7/9/2012	Review Notices of electronic filings for motions to strike answers of Birdwell and Travis	0.2	200.00	40.00
7/9/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
7/30/2012	Review minute order from court regarding pre-trial order	0.2	200.00	40.00
7/30/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
7/30/2012	(NO CHARGE) Review and Respond to several e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
7/31/2012	(NO CHARGE) Review and Respond to several e-mails from D. Partielli regarding trial [REDACTED]	0.5	0.00	0.00
Total				\$80.00
Payments/Credits				\$0.00
Balance Due				\$80.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 154**Invoice Date:** 11/14/2012**Due Date:** 11/14/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
10/23/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.2	0.00	0.00
10/25/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.2	0.00	0.00
10/29/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.2	0.00	0.00
10/29/2012	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.2	0.00	0.00
11/5/2012	Review Plaintiff's Opposition to Motion in Limine to Admit documents in preparation to Draft Reply	0.5	200.00	100.00
11/5/2012	Review motion for summary judgment and response to motion for summary judgment in preparation to Draft Reply to Plaintiff's Opposition to Motion in Limine to Admit documents	1	200.00	200.00
11/5/2012	Review declarations of D. Partielli and J. Kashani in preparation to Draft Reply to Plaintiff's Opposition to Motion in Limine to Admit documents	0.5	200.00	100.00
11/5/2012	Review case law and other authority related to judicial estoppel in preparation to Draft Reply to Plaintiff's Opposition to Motion in Limine to Admit documents	1	200.00	200.00
11/5/2012	Draft Reply to Plaintiff's Opposition to Motion in Limine to Admit documents	4	200.00	800.00
11/5/2012	Prepare Reply to Plaintiff's Opposition to Motion in Limine to Admit documents for filing	0.5	200.00	100.00
11/5/2012	Draft e-mail to all counsel regarding Reply to Plaintiff's Opposition to Motion in Limine to Admit documents and preparation for the upcoming trial	0.2	200.00	40.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 154**Invoice Date:** 11/14/2012**Due Date:** 11/14/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
11/5/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
11/6/2012	Telephone call with J. Gerber (attorney for Plaintiff) regarding trial and J. Kashani	0.3	200.00	60.00
11/6/2012	Review and Respond to multiple e-mails from all counsel regarding trial witnesses and exhibits	0.5	200.00	100.00
11/6/2012	(NO CHARGE) Draft multiple e-mails to client regarding [REDACTED]	0.5	0.00	0.00
11/6/2012	Review minute order defaulting SMI Defendants	0.1	200.00	20.00
11/7/2012	Review Pre-Trial Order regarding filings in preparation for trial	0.5	200.00	100.00
11/7/2012	Review case law on cause of action and counterclaims in preparation to Draft Findings of Fact and Conclusions of Law and Trial Brief	2.5	200.00	500.00
11/7/2012	Draft Findings of Fact, Conclusions of Law	4	200.00	800.00
11/7/2012	Revise/Finalize Findings of Fact, Conclusions of Law	1	200.00	200.00
11/8/2012	Review stipulation to continue trial and make revisions	0.5	200.00	100.00
11/8/2012	Review and Respond to multiple e-mails from all counsel regarding stipulation to continue trial and make revisions	1	200.00	200.00
11/8/2012	Prepare Exhibit List (including time to review Exhibits)	1.5	200.00	300.00
11/8/2012	Draft Trial Brief	5	200.00	1,000.00
11/8/2012	Revise/Finalize Trial Brief	1	200.00	200.00
11/9/2012	Review Couture's Trial Brief and Proposed Findings of Fact, Conclusions of Law	0.5	200.00	100.00
11/9/2012	Review Plaintiff's Trial Brief and Proposed Findings of Fact, Conclusions of Law	0.5	200.00	100.00
11/9/2012	Review Couture's Exhibit List	0.2	200.00	40.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 154**Invoice Date:** 11/14/2012**Due Date:** 11/14/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
11/9/2012	Review e-mail from Defense Counsel regarding SMI deposition transcripts	0.1	200.00	20.00
11/9/2012	(NO CHARGE) Draft e-mail to client regarding [REDACTED]	0.1	0.00	0.00
11/13/2012	Review minute order regarding change of calendar call and trial date	0.2	200.00	40.00
11/8/2012	Pacer Cost		0.30	0.30
			Total	\$5,420.30
			Payments/Credits	\$0.00
			Balance Due	\$5,420.30

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 168**Invoice Date:** 12/11/2012**Due Date:** 12/11/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
11/14/2012	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
11/15/2012	Review and Respond to e-mail from J. Gerber (attorney for Plaintiff) regarding potential resolution	0.2	200.00	40.00
11/16/2012	Review e-notice regarding undeliverable mail to SMI Defendants	0.2	200.00	40.00
11/19/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
11/20/2012	Review e-notices regarding returned mail to SMI Defendants	0.2	200.00	40.00
11/26/2012	Review Motion to Strike Reply brief to Motion in Limine to admit documents in preparation to Draft Opposition to the same	0.5	200.00	100.00
11/26/2012	Draft Opposition to Motion to Strike Reply brief to motion in limine	1	200.00	200.00
11/26/2012	Prepare Opposition to Motion to Strike Reply brief to motion in limine for filing	0.5	200.00	100.00
11/26/2012	Draft e-mail to all counsel regarding Opposition to Motion to Strike Reply brief to motion in limine	0.2	200.00	40.00
12/11/2012	Draft/Revise Motion in Limine re: Judicial Estoppel issue	3	200.00	600.00
Total				\$1,160.00
			Payments/Credits	\$0.00
Balance Due				\$1,160.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 169**Invoice Date:** 12/31/2012**Due Date:** 12/31/2012**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
12/11/2012	Draft e-mail to all counsel regarding motion in limine re: judicial estoppel	0.2	0.00	0.00
12/12/2012	Review correspondence from J. Gerber (attorney for Plaintiff) regarding Rule 11 21 Day Notice to withdraw MIL based on alleged expiration of deadline	0.5	0.00	0.00
12/12/2012	Draft e-mail to J. Gerber (attorney for Plaintiff) regarding request for conference call to Court regarding deadline to file MIL	0.2	0.00	0.00
12/12/2012	Review and Respond to multiple e-mails from J. Gerber (attorney for Plaintiff) regarding deadline to file MIL and Rule 11 letter	0.5	0.00	0.00
12/12/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
12/12/2012	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
12/20/2012	Review and Respond to e-mail from J. Gerber (attorney for Plaintiff) regarding conference call to Court regarding deadline to file an MIL	0.2	0.00	0.00
12/28/2012	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
Total				\$0.00
Payments/Credits				\$0.00
Balance Due				\$0.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 187**Invoice Date:** 2/1/2013**Due Date:** 2/1/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
1/2/2013	(NO CHARGE) Review and Respond to multiple e-mails from J. Gerber (attorney for WMCV) regarding withdrawal of Judicial Estoppel MIL	0.5	0.00	0.00
1/3/2013	(NO CHARGE) Review and Respond to multiple e-mails from J. Gerber (attorney for WMCV) regarding withdrawal of Judicial Estoppel MIL	0.5	0.00	0.00
1/4/2013	(NO CHARGE) Review and Respond to multiple e-mails from J. Gerber (attorney for WMCV) regarding withdrawal of Judicial Estoppel MIL	0.5	0.00	0.00
1/8/2013	(NO CHARGE) Draft notice of withdrawal of judicial estoppel MIL and Stipulation to withdraw Plaintiff's related briefs	1.5	0.00	0.00
1/8/2013	(NO CHARGE) Draft e-mail to J. Gerber (attorney for Plaintiff) regarding proposed withdrawal documents	0.2	0.00	0.00
1/8/2013	Draft e-mail to J. Gerber (attorney for Plaintiff) regarding status on trial subpoenas	0.2	200.00	40.00
1/8/2013	Review minute order from district court regarding reassignment of case to new magistrate	0.2	200.00	40.00
1/9/2013	Draft e-mail to CII (process server) regarding service of subpoenas on Plaintiff	0.2	200.00	40.00
1/10/2013	(NO CHARGE) Review minute order on stipulation to withdraw MIL re: Judicial Estoppel and related briefs	0.2	0.00	0.00
1/10/2013	Draft e-mail to CII (process server) regarding service of subpoenas on Plaintiff	0.2	200.00	40.00
1/10/2013	Review and Respond to e-mail from CII regarding service of trial subpoenas	0.2	200.00	40.00
1/15/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding trial [REDACTED]	0.5	0.00	0.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 187**Invoice Date:** 2/1/2013**Due Date:** 2/1/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
1/16/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
1/16/2013	Review and Respond to multiple e-mails from J. Gerber (attorney for Plaintiff) regarding process server	0.5	200.00	100.00
1/16/2013	Telephone call with Process Server	0.2	200.00	40.00
1/17/2013	Review and Respond to multiple e-mails with J. Gerber (attorney for Defendants) regarding subpoenas and trial date	0.5	200.00	100.00
1/17/2013	(NO CHARGE) Review and Respond to multiple e-mails with D. Partielli regarding [REDACTED]	0.5	0.00	0.00
1/18/2013	Review and Respond to multiple e-mails with J. Gerber (attorney for Defendants) regarding subpoenas and trial date	0.5	200.00	100.00
1/21/2013	Travel to/from 333 Las Vegas Blvd to attend calendar call and Attend	2.5	200.00	500.00
1/21/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
1/21/2013	Review electronic filing notice from court regarding calendar call	0.2	200.00	40.00
1/21/2013	Review minute order denying motion in limine regarding admitting documents	0.2	200.00	40.00
1/22/2013	Review electronic filing notice regarding mailings to SMI Defendants	0.2	200.00	40.00
1/22/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
1/24/2013	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
1/28/2013	Review multiple electronic notices regarding filings for SMI Defendants	0.3	200.00	60.00
1/15/2013	Payment of Judicial Estoppel Motion Restitution		500.00	500.00
Total				\$1,720.00
Payments/Credits				\$0.00
Balance Due				\$1,720.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 204**Invoice Date:** 2/28/2013**Due Date:** 2/28/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
2/4/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
2/5/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
2/6/2013	Review and Respond to e-mail from J. Gerber (attorney for Plaintiff) regarding joint exhibit list	0.2	200.00	40.00
2/6/2013	Review revised Joint Exhibit List	0.5	200.00	100.00
2/6/2013	(NO CHARGE) Draft multiple e-mails to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
2/11/2013	Review and Respond to e-mail from J. Gerber (attorney for Plaintiff) regarding deposition transcript	0.2	200.00	40.00
2/11/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
2/11/2013	Review notice of filing for joint exhibit list	0.2	200.00	40.00
2/12/2013	Review information prepared by D. Partielli regarding trial testimony in preparation to prepare outline	1	200.00	200.00
2/12/2013	Prepare outline of questions for D. Partielli	2	200.00	400.00
2/13/2013	Review trial exhibits and other information in preparation to prepare questions for J. Leleu and J. Kashani	2	200.00	400.00
2/13/2013	Prepare outline of questions for J. Kashani	1	200.00	200.00
2/13/2013	Prepare outline of questions for J. Leleu	2	200.00	400.00
2/13/2013	(NO CHARGE) Telephone call with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
2/13/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
2/18/2013	Review e-notice from court resetting trial date	0.2	200.00	40.00
2/18/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.3	0.00	0.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 204**Invoice Date:** 2/28/2013**Due Date:** 2/28/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
2/1/2013	Service of Subpoenas		35.00	35.00
2/1/2013	Service of Subpoena		35.00	35.00
	Total Reimbursable Expenses			70.00
Total				\$1,930.00
Payments/Credits				\$0.00
Balance Due				\$1,930.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 221**Invoice Date:** 4/1/2013**Due Date:** 4/1/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
3/4/2013	(NO CHARGE) Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.2	0.00	0.00
3/5/2013	Draft e-mail to J. Gerber regarding updated exhibit list	0.2	200.00	40.00
3/5/2013	Prepare updated exhibit list (including review of documents)	1	200.00	200.00

Total	\$240.00
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Payments/Credits	\$0.00
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Balance Due	\$240.00
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Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 302**Invoice Date:** 7/7/2013**Due Date:** 7/7/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
6/3/2013	Review trial briefs, exhibits, testimony notes, and other documents in preparation to review materials in advance of trial and provide to D. Partielli for review	6	200.00	1,200.00
6/3/2013	(NO CHARGE) Draft multiple e-mails to D. Partielli regarding case [REDACTED]	0.5	0.00	0.00
6/3/2013	(NO CHARGE) Telephone call with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/4/2013	Draft e-mail to J. Gerber (attorney for Plaintiff) regarding trial	0.2	200.00	40.00
6/7/2013	Trial preparation with D. Partielli regarding trial testimony and documents	1.5	200.00	300.00
6/7/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/10/2013	Review and Respond to multiple e-mails with J. Gerber (attorney for Plaintiff) regarding deposition excerpts and trial binders	0.5	200.00	100.00
6/10/2013	Review Deposition of M. Travis in preparation to designate testimony	2	200.00	400.00
6/10/2013	Review Deposition of R. Birdwell in preparation to designate testimony	2	200.00	400.00
6/10/2013	Prepare designation of testimony of M. Travis	2	200.00	400.00
6/10/2013	Prepare designation of testimony of R. Birdwell	2	200.00	400.00
6/10/2013	(NO CHARGE) Telephone call with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/10/2013	Review Plaintiff's designation of transcript	0.5	200.00	100.00
6/11/2013	Travel to/from 333 So. Las Vegas Blvd. to attend trial and Attend	9	200.00	1,800.00
6/11/2013	Review materials and notes in preparation for trial	1	200.00	200.00
6/11/2013	Review Minutes of Proceedings	0.2	200.00	40.00
6/12/2013	Travel to/from 333 So. Las Vegas Blvd. to attend trial and Attend	2	200.00	400.00

Total**Payments/Credits****Balance Due**

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 302**Invoice Date:** 7/7/2013**Due Date:** 7/7/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
6/12/2013	(NO CHARGE) Telephone call with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/12/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.3	0.00	0.00
6/12/2013	Review deceptive trade practices statute and case law	1	200.00	200.00
6/12/2013	Review and Respond to multiple e-mails from J. Gerber (attorney for Plaintiff) regarding closing briefs	0.5	200.00	100.00
6/12/2013	Review trial exhibits in preparation to Draft Revised Findings of Fact, Conclusions of Law	2	200.00	400.00
6/12/2013	Revise Findings of Fact, Conclusions of Law	5	200.00	1,000.00
6/12/2013	Research case law and authority on objective/subjective reasonableness in apparent authority	1	200.00	200.00
6/17/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
6/21/2013	Review notice of filing of transcript	0.2	200.00	40.00
6/11/2013	Parking for Trial		4.00	4.00
6/11/2013	Parking for Trial		2.00	2.00
	Total Reimbursable Expenses			6.00
Total				\$7,726.00
Payments/Credits				\$0.00
Balance Due				\$7,726.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 321**Invoice Date:** 8/7/2013**Due Date:** 8/7/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
7/7/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding closing [REDACTED]	0.5	0.00	0.00
7/7/2013	Review and Finalize FOFCOL	3	200.00	600.00
7/8/2013	Review case law and other authority related to apparent authority, affirmative defenses, accord and satisfaction, unclean hands, and other areas in preparation to Draft Closing Brief	2.5	200.00	500.00
7/8/2013	Review trial exhibits and other information in preparation to Draft Closing Brief	2	200.00	400.00
7/8/2013	Draft Closing Brief	6	200.00	1,200.00
7/8/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
7/8/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
7/9/2013	(NO CHARGE) Telephone call with D. Partielli regarding [REDACTED]	0.3	0.00	0.00
7/9/2013	Revise closing brief with information regarding J. Kashani and impeachment	0.5	200.00	100.00
7/10/2013	Prepare Closing Brief and Amended FOFCOL for filing	0.5	200.00	100.00
7/10/2013	Review Plaintiff's Closing Brief and FOFCOL	1	200.00	200.00
7/11/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding status [REDACTED]	0.3	0.00	0.00
Total				\$3,100.00
Payments/Credits				\$0.00
Balance Due				\$3,100.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 367**Invoice Date:** 9/30/2013**Due Date:** 9/30/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
9/16/2013	Telephone call with F. Perez (attorney for Birdwell) regarding potential settlement	0.2	200.00	40.00
9/16/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
9/17/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding Birdwell [REDACTED]	0.5	0.00	0.00
9/17/2013	Review and Respond to e-mail from J. Gerber (attorney for WMCV) regarding settlement [REDACTED]	0.2	200.00	40.00
9/25/2013	Review correspondence from F. Perez (attorney for Birdwell) regarding offer to settle	0.2	200.00	40.00
9/25/2013	Draft e-mail to F. Perez (attorney for Birdwell) regarding settlement offer and response	0.2	200.00	40.00
Total				\$160.00
Payments/Credits				\$0.00
Balance Due				\$160.00

Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 385**Invoice Date:** 10/31/2013**Due Date:** 10/31/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
10/4/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
10/4/2013	Review correspondence from F. Perez (attorney for Birdwell) regarding settlement offer	0.2	200.00	40.00
10/4/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
10/8/2013	Draft e-mail to F. Perez (attorney for Birdwell) regarding rejection of settlement offer	0.2	200.00	40.00
10/22/2013	Review motion to set aside default	0.1	200.00	20.00
10/22/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.2	0.00	0.00
10/22/2013	Draft e-mail to J. Gerger (attorney for WMCV Phase 3) regarding motion to set aside default	0.2	200.00	40.00
10/22/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00
10/23/2013	(NO CHARGE) Review and Respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.5	0.00	0.00

Total	\$140.00
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Payments/Credits	\$0.00
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Balance Due	\$140.00
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Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 396**Invoice Date:** 12/2/2013**Due Date:** 12/2/2013**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
11/7/2013	Review ECF Notice regarding filing of Response to A. Birdwell's motion to set aside default	0.2	200.00	40.00
11/7/2013	(NO CHARGE) Draft e-mail to D. Partielli regarding [REDACTED]	0.1	0.00	0.00
11/13/2013	(NO CHARGE) Review and respond to multiple e-mails from D. Partielli regarding [REDACTED]	0.2	0.00	0.00

Total	\$40.00
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Payments/Credits	\$0.00
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Balance Due	\$40.00
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Michael B. Lee, P.C.2000 So. Eastern Avenue
Las Vegas, NV 89104**Invoice****Invoice #:** 410**Invoice Date:** 1/3/2014**Due Date:** 1/3/2014**Project:****P.O. Number:****Bill To:**

Global Accents

Serviced	Description	Hours	Rate	Amount
12/30/2013	Review minute order regarding notice of decision and decision	0.2	200.00	40.00
12/30/2013	Review Decision granting judgment for Global	0.5	200.00	100.00
12/30/2013	Draft e-mail to client regarding notice of decision and award of attorneys' fees and costs	0.2	200.00	40.00
12/30/2013	Telephone call with D. Partielli regarding decision and future handling	0.2	200.00	40.00
12/30/2013	Draft e-mail to G. Schnitzer (former attorney) regarding request for AR on prior fees and costs	0.1	200.00	20.00
12/30/2013	Review case law and other authority related to attorneys' fees and costs	1	200.00	200.00
12/30/2013	Draft motion for attorneys' fees and costs	3	200.00	600.00
12/30/2013	Draft declaration in support of attorneys' fees and costs	0.5	200.00	100.00
Total				\$1,140.00
Payments/Credits				\$0.00
Balance Due				\$1,140.00

Exhibit A-2

Exhibit A-2

KSSJ			MBL		Costs	
			\$ 1,500.00			
\$ 2,500.00	\$ (548.50)	16.50	\$ 60.00	0.30	\$	70.00
	\$ (548.50)	8.60	\$ 20.00	0.60	\$	3.00
\$ 1,554.00		0.60	\$ 40.00	0.70	\$	70.00
\$ 126.00		2.10	\$ 100.00	0.40		
\$ 473.00		13.30	\$ 1,060.00	0.50	2011 - 2 Months	
\$ 2,897.00		17.90	\$ 220.00	5.60	2012 - 12 Months	
\$ 1,460.00	\$ (2,299.00)	0.90	\$ 2,170.00	1.40	2013 - 12 Months	
\$ 189.00		0.30	\$ 80.00	12.85	2014 - 1 Month	
\$ 63.00		5.50	\$ 2,103.00	2.60		
\$ 1,155.00		3.50	\$ 5,420.30	11.60		
\$ 735.00		6.40	\$ 1,160.00	28.90		
\$ 1,344.00		7.20	\$ 1,720.00	6.50		
\$ 1,548.00		1.00	\$ 1,930.00	2.50		
\$ 105.00		10.50	\$ 240.00	11.90		
\$ 2,028.00		7.00	\$ 7,726.00	11.50		
\$ 903.00		14.90	\$ 3,100.00	2.50		
\$ 147.00	\$ (2,730.00)	1.10	\$ 160.00	1.40		
\$ 273.00		1.30	\$ 140.00	41.10		
\$ 17,500.00	\$ (6,126.00)	118.60	\$ 40.00	17.20		
			\$ 200.00	1.50		
	\$ (6,126.00)		\$ 180.00	2.50		
			\$ 1,500.00	0.50		
			\$ 1,140.00	5.70		
\$ 17,500.00			\$ 32,009.30	1.50	\$ 49,510.80	\$ 49,510.80
				6.40		
				178.15		\$ 51,000.80

Option 1		Option 2		
fees	\$ 49,510.80	KSSJ Time	118.60	\$ 68,252.50
write off	\$ 6,126.00	MBL Time	178.15	\$ 1,490.00
costs	\$ 1,490.00			\$ 9,848.92
Interest	\$ 9,848.92	KSSJ Time 2	\$ 27,278.00	\$ 1,110.00
expenses	\$ 1,110.00	MBL Time 2	\$ 40,974.50	
	\$ 68,085.72		\$ 68,252.50	\$ 80,701.42
fees	\$ 2,500.00		\$ 2,500.00	\$ 2,500.00
	\$ 70,585.72		\$ 70,752.50	\$ 83,201.42

Exhibit A-3

Exhibit A-3

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

May 24, 2010

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 810411

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
04 /26/10	GES	Review Complaint; telephone with Plaintiff's attorney; telephone with attorney for co-defendant; letter to opposing attorney	1.20	\$300.00
05 /03/10	GES	Telephone with attorney for Shoshuk(x2)	0.30	\$75.00
05 /04/10	GES	Telephone with client; telephone with attorney for Shushok	0.50	\$125.00
	MBL	Comprehensive review of client documents to identify lease, settlement agreement, parties, wire transfers, and communications in preparation for discussion with client regarding future handling	1.50	\$315.00
	MBL	Telephone call with client and GES regarding assessment and future handling	0.20	\$42.00
	MBL	Review and Respond to multiple e-mails from B. Kimble (attorney for Shushok and McCoy) regarding removal and future handling	0.30	\$63.00
05 /05/10	GES	Telephone with attorney for Shushok re: removal (x2)	0.40	\$100.00
	MBL	Review and Respond to multiple e-mails from B. Kimble (attorney for Shushok and McCoy) regarding removal and future handling	0.30	\$63.00
05 /06/10	GES	Telephone with attorney for Shushok; review court filings	0.40	\$100.00

	MBL	Review and Respond to multiple e-mails from B. Kimble (attorney for Shushok & McCoy) regarding removal	0.30	\$63.00
	MBL	Review Notices of Removal	0.50	\$105.00
05 /07/10	MBL	Draft Notices of Representation and Certificate of interested parties as required by local rules	0.50	\$105.00
05 /11/10	TJG	Review file materials and draft Motion to Dismiss statement of facts.	1.30	\$273.00
	TJG	Draft introduction and related portions of Motion to Dismiss.	0.50	\$105.00
	TJG	Draft legal standard for motion to dismiss including summary judgment standard.	0.90	\$189.00
	TJG	Research principal's liability for acts of agent for use in Motion to Dismiss.	0.80	\$168.00
05 /12/10	TJG	Draft portions of Motion to Dismiss with emphasis on legal argument.	0.80	\$168.00
05 /13/10	TJG	Continue drafting Motion to Dismiss; draft supporting affidavit.	2.30	\$483.00
	TJG	Revise Motion to Dismiss per supervising attorney's instructions.	1.00	\$210.00
	TJG	Telephone call to client regarding Motion to Dismiss.	0.20	\$42.00
05 /14/10	GES	Review and finalize Motion to Dismiss	0.50	\$125.00
	TJG	Receive and consider comments made by client to draft Motion to Dismiss; email client regarding same; discuss with supervising attorney; telephone call to client; revise Motion; send same to client with instructions.	0.90	\$189.00
	TJG	Draft additional changes to Motion to Dismiss required by supervising attorney.	0.20	\$42.00
05 /17/10	MBL	Review Stipulation and Order to Extend Time for Response for Shushok and McCoy	0.10	\$21.00
	MBL	Review certificate of no known interested parties by Plaintiff	0.10	\$21.00
	MBL	Review minute order regarding removal statement and joint status report, case assignment to Judge Jones, and local rule requirement statement	0.30	\$63.00

	MBL	Draft e-mail to B. Kimble (attorney for Shushok & McCoy) regarding removal statement and joint status report	0.10	\$21.00
	MBL	Review Order Granting Stipulation to file Response	0.10	\$21.00
05 /18/10	MBL	Reduction of Atty Lee's fees per Atty Schnitzer		-\$548.50
	TJG	Reduction of Atty Geswein's fees per Atty Schnitzer		-\$548.50

TOTAL FEES

16.50

\$2,500.00

TOTAL PROFESSIONAL SERVICES
RENDERED FOR THIS MONTH

\$2,500.00

PREVIOUS BALANCE

\$0.00

PAYMENTS RECEIVED

\$2,500.00

PLEASE PAY THIS AMOUNT

\$0.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

TRUST STATEMENT

		Disbursements	Receipts
05 /05/10	Retainer		\$5,000.00
05 /24/10	Payment for invoice: 810411		
		\$2,500.00	
		<hr/>	<hr/>
	Total Trust	\$2,500.00	\$5,000.00
	Trust Balance		\$2,500.00

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph:(702) 362-6666

Fax:(702) 362-2203

Jun 24, 2010

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 817829

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
05 /21/10	MBL	Review and Respond to e-mail from B. Kimble (attorney for Shushok & McCoy) regarding Statement Concerning Removal (including review of proposed statement of removal)	0.50	\$105.00
05 /25/10	MBL	Review and Respond to e-mail from B. Kimble (attorney for Shushok & McCoy) regarding change in language to Statement of Removal	0.10	\$21.00
05 /27/10	GES	Review various filings	0.30	\$75.00
	MBL	Notice of Reassignment of case to Judge Gloria Navarro	0.10	\$21.00
06 /02/10	MBL	Review Shushok & McCoy's Motion to Dismiss for lack of personal jurisdiction	0.50	\$105.00
06 /04/10	GES	Review Opposition to Summary Judgment	0.30	\$75.00
	MBL	Review minute order from court regarding extension of time to respond to motion to dismiss	0.10	\$21.00
	TJG	Review Opposition to Motion to Dismiss; draft Reply in Support of Motion.	2.60	\$546.00
06 /07/10	GES	Revise and finalize Reply brief	1.50	\$375.00
	TJG	Revise Reply in Support of Motion to Dismiss pursuant to supervising attorney's instructions.	0.30	\$63.00

	TJG	Review supervising attorney's changes to Reply; email same to client for review.	0.30	\$63.00
	TJG	Research additional points of law and revise Reply as instructed by supervising attorney. (no charge)	0.80	\$0.00
	TJG	Revise reply pursuant to supervising attorney's instructions (no charge)	0.80	\$0.00
06 /08/10	MBL	Review and Respond to e-mail from B. Kimble (attorney for Shushok & McCoy) regarding Joint Status Report	0.20	\$42.00
	MBL	Review e-mail from C. Robinson (attorney for Plaintiff) regarding approval of Joint Status Report	0.10	\$21.00
06 /09/10	MBL	Review Order granting stipulation to extend time	0.10	\$21.00

TOTAL FEES	8.60	\$1,554.00
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TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH	\$1,554.00
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PREVIOUS BALANCE	\$0.00
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PAYMENTS RECEIVED	\$1,554.00
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PLEASE PAY THIS AMOUNT	\$0.00
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Please reference invoice number on payment. Thank you.

TIN: 88-0243864

TRUST STATEMENT

Disbursements

Receipts

\$2,500.00

06 /24/10 Payment for invoice: 817829

\$1,554.00

Total Trust

\$1,554.00

\$2,500.00

Trust Balance

\$946.00

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

Jul 24, 2010

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502Inv #: 823287
Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
06 /28/10	MBL	review order granting stipulation to extend time to file reply brief to Shushok & McCoy's motion to dismiss	0.10	\$21.00
06 /29/10	MBL	Review Plaintiff's Reply to Opposition to Motion for Summary Judgment requesting declaratory relief	0.30	\$63.00
	MBL	Draft e-mail to client regarding [REDACTED]	0.10	\$21.00
06 /30/10	MBL	Review and Respond to e-mail from D. Partielli regarding [REDACTED]	0.10	\$21.00
TOTAL FEES			0.60	\$126.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH				\$126.00
PREVIOUS BALANCE				\$0.00

PAYMENTS RECEIVED

\$126.00

PLEASE PAY THIS AMOUNT

\$0.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

TRUST STATEMENT

Disbursements

Receipts

\$946.00

07 /24/10 Payment for invoice: 823287

\$126.00

Total Trust

\$126.00

\$946.00

Trust Balance

\$820.00

***KRAVITZ, SCHNITZER
& JOHNSON, CHTD.***

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph:(702) 362-6666

Fax:(702) 362-2203

Oct 24, 2010

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 839980
Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
10 /06/10	GES	Review Order	0.30	\$75.00
	MBL	Review Order from the Court regarding Motion to Dismiss/Motion for Summary Judgment and draft e-mail summarizing it	0.50	\$105.00
10 /11/10	MBL	Review Notice of Change of Attorney	0.10	\$21.00
10 /13/10	MBL	Review Minute Order from court ordering a proposed discovery plan and scheduling order	0.10	\$21.00
10 /15/10	MBL	Review Notice of Change of Counsel and request for removal of C. Robinson	0.10	\$21.00
	MBL	Review and Respond to multiple e-mails from M. Cecil (attorney for Plaintiff) regarding discovery conference	0.50	\$105.00
10 /18/10	GES	Review correspondence from counsel; telephone with counsel re: settlement	0.50	\$125.00
TOTAL FEES			2.10	\$473.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH				\$473.00

PREVIOUS BALANCE

\$0.00

PAYMENTS RECEIVED

\$473.00

PLEASE PAY THIS AMOUNT

\$0.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

TRUST STATEMENT**Disbursements****Receipts**

\$820.00

10 /24/10 Payment for invoice: 839980

\$473.00

Total Trust

\$473.00

\$820.00

Trust Balance**\$347.00**

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

Nov 24, 2010

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 844631

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
10 /19/10	GES	Prepare for early case conference: Telephone conference with opposing counsel	1.40	\$350.00
	MBL	Review multiple e-mails from all counsel regarding request for Discovery Scheduling Conference	0.20	\$42.00
	MBL	Attend Telephonic 26(f) Discovery Conference	0.60	\$126.00
	MBL	Draft initial Answer and Cross Claim against S&M Defendants (including time to review client documents and pleadings)	1.50	\$315.00
10 /20/10	GES	Correspondence with opposing attorney; telephone with client	0.50	\$125.00
10 /21/10	GES	Correspondence with opposing attorney	0.30	\$75.00
	MBL	Review client documents in search for witnesses, documents, leases, releases, and other information and Draft Production of Documents and Witnesses Pursuant to FRCP 26(f)	2.50	\$525.00
	MBL	Review and Respond to e-mail from all counsel regarding changing date for close of discovery	0.20	\$42.00
	MBL	Review Proposed Discovery Schedule and Revise provision regarding depositions of parties in Las Vegas	1.00	\$210.00
	MBL	Draft e-mail to all counsel regarding changes to Proposed Discovery Schedule	0.10	\$21.00

	MBL	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding changes to Discovery Plan (including revised plan)	0.50	\$105.00
10 /22/10	MBL	Review and Respond to e-mail from B. Kimble (attorney for Shushok Defendants) regarding Stipulation to Enlarge time to file responsive pleading (including time to review proposed stipulation)	0.50	\$105.00
	MBL	Review filed Stipulation and Order to enlarge time to file responsive pleading	0.10	\$21.00
10 /25/10	MBL	Review filed Discovery Plan and Scheduling Order	0.10	\$21.00
10 /27/10	MBL	Review Order on Stipulation to Enlarging Time to File Answer	0.10	\$21.00
	MBL	Review Order regarding filing of Joint Interim Discovery Status Reports	0.10	\$21.00
	MBL	Review Scheduling Order	0.10	\$21.00
11 /03/10	GES	Telephone with opposing counsel re: settlement	0.40	\$100.00
	MBL	Telephone call with B. Kemble (attorney for Shushok) regarding global settlement	0.30	\$63.00
	MBL	Telephone call with M. Cecil (attorney for Plaintiff) regarding apparent authority and amended pleading	0.20	\$42.00
11 /08/10	MBL	Review Notice of Filing of Amended Complaint	0.10	\$21.00
11 /17/10	MBL	Review First Amended Complaint in preparation to Draft an Answer, Counterclaim, and Cross claim (previously drafted)	0.50	\$105.00
	MBL	Draft Answer to First Amended Complaint and Counterclaims against Plaintiff	2.00	\$420.00
TOTAL FEES			13.30	\$2,897.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH				\$2,897.00
PREVIOUS BALANCE				\$0.00

PAYMENTS RECEIVED

\$347.00

PLEASE PAY THIS AMOUNT

\$2,550.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

TRUST STATEMENT

Disbursements

Receipts

\$347.00

11 /24/10 Payment for invoice: 844631

\$347.00

Total Trust

\$347.00

\$347.00

Trust Balance

\$0.00

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

Dec 29, 2010

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 850461

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
11 /19/10	MBL	Review and Respond to e-mail from B. Kimble (attorney for S&M) regarding extension for filing of responsive pleading	0.20	\$42.00
11 /23/10	MBL	Review correspondence from B. Kimble (attorney for S&M) regarding settlement offer	0.30	\$63.00
	MBL	Telephone call with B. Kimble (attorney for S&M) regarding cross claims and potential damages	0.30	\$63.00
11 /29/10	MBL	Review Notice of Filing of Subpoena to Couture	0.10	\$21.00
	MBL	Review Stipulation and Order Extending Time for S&M to Answer	0.10	\$21.00
12 /06/10	MBL	Telephone call with M. Cecil (attorney for Plaintiff) regarding potential settlement obstacles and filing of Answer to Counterclaims	0.30	\$63.00
12 /10/10	MBL	Review Stipulation and Order enlarging time for S&M to file Responsive Pleading	0.10	\$21.00
	MBL	Review S&M's Answer to Amended Complaint	0.30	\$63.00
12 /16/10	MBL	Discussion with T. Coffing (attorney for Plaintiff) regarding potential dismissal of Global from action	0.20	\$42.00
	MBL	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding potential dismissal of Global	0.10	\$21.00

	MBL	Telephone call with M. Cecil (attorney for Plaintiffs) regarding potential dismissal of Global	0.30	\$63.00
	MBL	Review and Respond to multiple e-mails from B. Kimble (attorney for S&M) regarding extension to file responsive pleading to cross claims	0.30	\$63.00
	MBL	Review Proposed Stipulation to Extend Time to File Responsive Pleading	0.20	\$42.00
	MBL	Review Notice of Filing of Stipulation to Enlarge Time to File Responsive Pleading	0.10	\$21.00
12 /20/10	MBL	Review Minute Order granting stipulation to enlarge time to answer	0.10	\$21.00
	MBL	Review documents disclosed by Plaintiffs identified as WMCV 00001 - 000057 (lease agreements, amendments, Global Lease Release, and other documents) to identify culpable Third-Party, contractual terms, and other information relevant to defense of this action	1.00	\$210.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 000058 - 300 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 00301 - 600 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 00601 - 900 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 00901 - 1200 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00

	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 001201 - 1500 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 001501 - 1800 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 001801 - 2100 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Continued Review documents disclosed by Plaintiffs identified as WMCV 002101 - 2515 (correspondence between WMCV and S&M with attachments) to identify culpable Third-Party, grant of apparent authority, actual knowledge of Plaintiff, lack of rescinding of authority, and other information relevant to defense of this action	1.50	\$315.00
	MBL	Review Plaintiffs' Initial Disclosures and damages computation	0.20	\$42.00
12 /22/10	MBL	Review and Respond to multiple e-mails from all counsel regarding Joint Status Report	0.50	\$105.00
	MBL	Review and Revise Joint Status Report to remove actual settlement offer language and revise	0.50	\$105.00
	MBL	Telephone call with B. Kemble (attorney for S&M) regarding Joint Status Report and potential resolution	0.20	\$42.00
	MBL	Review and Respond to e-mails from B. Kemble (attorney for S&M) regarding request for extension to file responsive pleading to cross claims (including time to review proposed stipulation)	0.50	\$105.00
04 /18/12	MBL	Write off per GES and close	0.00	-\$2,299.00

TOTAL FEES	17.90	\$1,460.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH		\$1,460.00
PREVIOUS BALANCE		\$2,550.00
PAYMENTS RECEIVED		\$0.00
PLEASE PAY THIS AMOUNT		\$4,010.00

Please reference invoice number on payment. Thank you.
TIN: 88-0243864

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

Jan 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502Inv #: 853225
Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
01 /12/11	MBL	Telephone call with B. Kimble (attorney for S&M) regarding settlement proposal to resolve case and other issues	0.30	\$63.00
01 /18/11	MBL	Review Answer to Cross Claim	0.30	\$63.00
	MBL	Telephone call with B. Kimble (attorney for S&M) regarding future handling and responsive pleading	0.30	\$63.00
TOTAL FEES			0.90	\$189.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH				\$189.00
PREVIOUS BALANCE				\$4,010.00
PAYMENTS RECEIVED				\$0.00
PLEASE PAY THIS AMOUNT				\$4,199.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

***KRAVITZ, SCHNITZER
& JOHNSON, CHTD.***
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

Feb 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 860400
Client #: 3979

RE: WMCV Phase 3, LLC

DATE	DESCRIPTION	HOURS	AMOUNT
02 /14/11	MBL Review Request for Production of Documents to S&M from Plaintiff	0.30	\$63.00
TOTAL FEES		0.30	\$63.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH			\$63.00
PREVIOUS BALANCE			\$4,199.00
PAYMENTS RECEIVED			\$0.00
PLEASE PAY THIS AMOUNT			\$4,262.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph:(702) 362-6666

Fax:(702) 362-2203

Mar 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 864802

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
03 /01/11	MBL	Telephone call with B. Kemble (attorney for S&M) regarding discovery, admission requests, and potential withdrawal by them	0.30	\$63.00
	MBL	Attempted phone call to M. Cecil (attorney for Plaintiff) regarding discovery requests	0.10	\$21.00
	MBL	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding discovery requests	0.10	\$21.00
	MBL	Draft Requests for Admissions to Plaintiff (including review of Complaint for language)	1.00	\$210.00
	MBL	Review case law and authority regarding agency, apparent authority, termination of authority, and rights of third party in preparation to Draft Request for Admissions	1.50	\$315.00
	MBL	Draft Request for Admissions to Defendant S&M (including review of documents for authentication in support of motion for summary judgment)	2.00	\$420.00
03 /08/11	MBL	Review and Respond to e-mail from B. Kemble (attorney for S&M) regarding request for admissions	0.20	\$42.00
03 /18/11	MBL	Review S&M's attorney's emergency motion to withdrawal as counsel	0.30	\$63.00
TOTAL FEES			5.50	\$1,155.00

TOTAL PROFESSIONAL SERVICES
RENDERED FOR THIS MONTH

\$1,155.00

PREVIOUS BALANCE

\$4,262.00

PAYMENTS RECEIVED

\$0.00

PLEASE PAY THIS AMOUNT

\$5,417.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

Apr 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 870513

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
03 /23/11	MBL	Review and Respond to multiple e-mails from all counsel regarding stipulation to enlarge discovery	0.50	\$105.00
03 /24/11	MBL	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding stipulation to enlarge discovery	0.20	\$42.00
	MBL	Review e-mail from B. Kemble (attorney for S&M) regarding stipulation to enlarge discovery	0.10	\$21.00
03 /29/11	MBL	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding request for stipulation to enlarge discovery and notice to him to file a motion	0.30	\$63.00
04 /04/11	MBL	Review and Respond to multiple e-mails from B. Kemble (attorney for S&M) regarding extension to file response to request for admission	0.50	\$105.00
04 /07/11	MBL	Review and Respond to e-mail from B. Kemble (attorney for S&M) regarding request for extension to answer discovery requests	0.20	\$42.00
	MBL	Review minute order setting hearing on request for enlargement of discovery	0.10	\$21.00
	MBL	Review minute order from court regarding S&M's counsel's motion to withdraw	0.10	\$21.00
	MBL	Review Motion to Enlarge Discovery	0.50	\$105.00
04 /11/11	TJW	Attend/appear in hearing for Plaintiff's Motion to Extend Discovery	0.90	\$189.00

04 /12/11 MBL Review minute order regarding discovery schedule 0.10 \$21.00

TOTAL FEES

3.50

\$735.00

TOTAL PROFESSIONAL SERVICES
RENDERED FOR THIS MONTH

\$735.00

PREVIOUS BALANCE

\$5,417.00

PAYMENTS RECEIVED

\$0.00

PLEASE PAY THIS AMOUNT

\$6,152.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph: (702) 362-6666

Fax: (702) 362-2203

May 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 876243

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
04 /25/11	TJW	Appear for/attend hearing re: discovery deadlines and co-defendant counsel's motion to withdraw	2.10	\$441.00
	MBL	Review Notice of Intent to dismiss for lack of service	0.10	\$21.00
	MBL	Review Proof of Service of Motion to Withdraw	0.10	\$21.00
04 /29/11	MBL	Review Notice of Appearance by C. Jorgensen (attorney for Couture)	0.10	\$21.00
	MBL	Review Notice of Motion to Strike S&M's Answer to Amended Complaint	0.10	\$21.00
05 /02/11	MBL	Review Motion to Enlarge Discovery by Couture	0.20	\$42.00
	MBL	Review Minutes of Proceeding of Motion to Withdraw	0.10	\$21.00
	MBL	Review Notice of Deposition for May 18, 2011	0.20	\$42.00
	MBL	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding deposition date and time for PMK of Global	0.20	\$42.00
	MBL	Review Notice of Deposition of S&M Defendants	0.20	\$42.00

	MBL	Review Plaintiff's Motion to Strike S&M Defendants' Answer	0.20	\$42.00
	MBL	Review Stipulation to Enlarge time to allow Couture to File Responsive Pleading	0.10	\$21.00
	MBL	Review Notice of Intent to Dismiss Summons for lack of service by Couture	0.10	\$21.00
05 /04/11	MBL	Review Order granting stipulation to enlarge deadline to file responsive pleading by Couture	0.20	\$42.00
05 /09/11	MBL	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding deposition of Global's PMK on May 18 and request for time/location change	0.20	\$42.00
	MBL	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding deposition of S&M's Defendants and nonappearance except for Birdwell deposition	0.10	\$21.00
05 /11/11	MBL	Review Motion to Extend Time regarding discovery/nondipositive matters	0.30	\$63.00
	MBL	Review Plaintiff's Joinder to Motion to Extend Time regarding discovery	0.20	\$42.00
05 /12/11	MBL	Review Notice of Filing of Interested Parties by Couture	0.10	\$21.00
05 /13/11	MBL	Review S&M's Answers, Counterclaim, and Cross claim against S&M	0.20	\$42.00
05 /16/11	MBL	Review Notice and Suggestion of Bankruptcy for M. Travis (S&M Defendant)	0.20	\$42.00
	MBL	Draft e-mail to M. Cecil (attorney for Plaintiff) regarding effect of M. Travis' (S&M Defendant) bankruptcy	0.20	\$42.00
05 /17/11	MBL	Review and Respond to multiple e-mails from M. Cecil (attorney for Plaintiff) regarding deposition of S&M witnesses	0.50	\$105.00
	MBL	Review Minute Order setting telephonic hearing for discovery dispute	0.10	\$21.00
	MBL	Telephone call with M. Cecil (attorney for Plaintiff) regarding discovery issues and potential resolution	0.30	\$63.00
TOTAL FEES			6.40	\$1,344.00

TOTAL PROFESSIONAL SERVICES
RENDERED FOR THIS MONTH

\$1,344.00

PREVIOUS BALANCE

\$6,152.00

PAYMENTS RECEIVED

\$0.00

PLEASE PAY THIS AMOUNT

\$7,496.00

Please reference invoice number on payment. Thank you.

TIN: 88-0243864

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph:(702) 362-6666

Fax:(702) 362-2203

Jun 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 881386

Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
05 /23/11	MBL	Review request for admissions from WMCV Phase 3 and documents related to authentication requests	2.00	\$420.00
	MBL	Draft/Revise Responses to request for admissions	2.00	\$420.00
05 /24/11	MBL	Review minute order related to stay of proceedings against M. Travis (S&M Defendant)	0.10	\$21.00
05 /26/11	MBL	Review Minutes of Court Hearing on Motion to Enlarge Discovery	0.10	\$21.00
06 /01/11	MBL	Review and Respond to multiple e-mails from M. Cecil (attorney for Plaintiff) regarding meet and confer related to Responses to Request for Admissions	0.30	\$63.00
	MBL	Telephone call with M. Cecil (attorney for Plaintiff) regarding meet and confer related to Responses to Request for Admissions	0.20	\$42.00
	MBL	Draft supplement to Responses to Request for Admissions related to authentication of documents	0.50	\$105.00
06 /02/11	MBL	Review correspondence from M. Cecil (attorney for Plaintiff) regarding stipulation to move deposition for Global's PMK	0.10	\$21.00
	MBL	Draft Statement regarding discovery commenced for Couture	0.50	\$105.00
	MBL	Review Plaintiff's Motion to Lift Stay against S&M	0.20	\$42.00

	MBL	Review Order Lifting Stay against S&M	0.20	\$42.00
06 /06/11	GES	Telephone with opposing attorney	0.40	\$100.00
06 /09/11	MBL	Review Notice of Deadline to object to confirmation of bankruptcy	0.10	\$21.00
06 /16/11	GES	Telephone with attorney for World	0.50	\$125.00

TOTAL FEES	7.20	\$1,548.00
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TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH	\$1,548.00
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PREVIOUS BALANCE	\$7,496.00
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PAYMENTS RECEIVED	\$0.00
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PLEASE PAY THIS AMOUNT	\$9,044.00
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Please reference invoice number on payment. Thank you.
TIN: 88-0243864

**KRAVITZ, SCHNITZER
& JOHNSON, CHTD.**

8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123

Ph:(702) 362-6666

Fax:(702) 362-2203

Jul 24, 2011

Danny Partielli
GLOBAL ACCENTS, INC.
19808 Normandie Avenue
Torrence, CA 90502

Inv #: 887439
Client #: 3979

RE: WMCV Phase 3, LLC

DATE		DESCRIPTION	HOURS	AMOUNT
06 /23/11	MBL	Review and Respond to e-mail from M. Cecil (attorney for Plaintiff) regarding agreement to stipulate to amended complaint for negligence claims	0.20	\$42.00
07 /12/11	MBL	Review substitution of attorney for Couture	0.10	\$21.00
07 /15/11	MBL	Review e-mail from D. Partielli regarding accounting [REDACTED]	0.20	\$42.00
	MBL	Telephone call with D. Partielli regarding case [REDACTED] [REDACTED]	0.30	\$0.00
	MBL	Draft e-mail to D. Partielli regarding [REDACTED] [REDACTED]	0.20	\$0.00
TOTAL FEES			1.00	\$105.00
TOTAL PROFESSIONAL SERVICES RENDERED FOR THIS MONTH				\$105.00
PREVIOUS BALANCE				\$9,044.00

EXHIBIT B

EXHIBIT B

DECLARATION OF PARHAM PARTIELLI

PARHAM PARTIELLI, being first duly sworn, deposes and says that he has personal knowledge and is competent to testify to the facts below. The facts stated herein are true to the best of my own personal knowledge, except for those facts stated upon information and belief, and as to those facts, I believe them to be true.

1. I am the manager of Global Accents, Inc. ("Global Accents").

2. I was the person responsible for overseeing the litigation conducted by the World Market Center aka WMCV Phase 3 ("Plaintiff"), and had to travel for depositions, settlement conference, and the trial.

3. I am making this Declaration in support of the Motion for attorneys' fees, expenses, and costs for Global Accents.

4. As to the attorneys' fees and costs, I have reviewed the invoices attached to Michael Lee's declaration and confirmed that they are accurate.

5. As to the expenses, Global Accents incurred costs of the following:

Travel	\$600.00	(6 flights)
Rental/Transportation	\$150.00	
Hotel	\$360.00	
	\$1,110.00	

6. I declare under the penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

FURTHER DECLARANT SAYETH NAUGHT

DATED this 7 day of January, 2014.


DECLARANT

MICHAEL B. LEE, P.C.
2000 SO. EASTERN AVENUE
LAS VEGAS, NEVADA 89104
TEL - (702) 477.7030; FAX - (702) 477.0096

EXHIBIT C

EXHIBIT C

1 GARY E. SCHNITZER, ESQ. (NSB 395)
MICHAEL B. LEE, ESQ. (NSB 10122)
2 KRAVITZ, SCHNITZER, SLOANE &
JOHNSON, CHTD.
3 8985 So. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
4 Tel - 702.222.4182
Fax - 702.362.2203
5 *Attorneys for Global Accents, Inc.*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8
9 WMCV PHASE 3, LLC, a Delaware limited
liability company,

Case No.: 2:10-cv-00661-RCJ-RJJ

10 Plaintiff,

11 vs.

12 SHUSHOK & MCCOY, INC., a Texas
corporation; MATTHEW J. TRAVIS, an
13 individual; MATT TURNER, an individual;
14 RICHARD BIRDWELL, an individual;
GLOBAL ACCENTS, INC., a California
15 corporation; COUTURE INTERNATIONAL,
INC., a Quebec corporation; DOES I through X,
16 inclusive; ROE ENTITIES I through X, inclusive,

17 Defendants.

18
19 **OFFER OF JUDGMENT**

20 Pursuant to NRCP 68 and NRS 17.115, Defendant, Global Accents, Inc. offers to allow
21 judgment to be taken against them in this action in the amount of FIVE THOUSAND DOLLARS AND
22 NO/100 (\$5,000.00), which amount includes costs and fees accrued to date. This Offer of Judgment is
23 made for the purposes specified in Rule 68 and NRS § 17.115 and is not to be construed either as an
24 admission that this Defendant is liable in this action, or that the Plaintiff has suffered any damage.

25 ///

1 This Offer of Judgment shall be deemed withdrawn if not accepted by the Plaintiff within ten
2 (10) days from the date of service hereof.

3 DATED: July 27, 2011

4 KRAVITZ, SCHNITZER, SLOANE &
5 JOHNSON, CHTD.

6 

7 GARY E. SCHNITZER, ESQ. (NSB 395)
8 MICHAEL B. LEE, ESQ. (NSB 10122)
9 8985 S. Eastern Avenue, Suite 200
10 Las Vegas, Nevada 89123
11 Tel - 702.222.4182
12 Fax - 702.362.2203
13 *Attorneys for Global Accents, Inc.*

14 **RECEIPT OF COPY**

15 RECEIVED this 28 day of July, 2011, the Offer of Judgment in this matter.

16 MARQUIS & AURBACH

17 By 

18 *Attorney for Plaintiff*

19 O:\ges\DATA\Global Accents adv WMCV Phase 3\Pleadings\Offer of Judgment.wpd

EXHIBIT D

EXHIBIT D

Mike Lee

From: Mike Lee <mike@mblnv.com>
Sent: Thursday, November 15, 2012 1:28 PM
To: 'Jason M. Gerber'
Subject: RE: Samuelian Settlement Agreement

Deleted.

Settlement is the same as always, a voluntary dismissal with both sides to carry their own fees and costs. I presume your client is still uninterested.

MICHAEL B. LEE, ESQ.



2000 So. Eastern Avenue, Las Vegas, NV 89104
Direct Line – 702.731.0244 Main Line: 702.477.7030 Fax: 702.477.0096
mike@mblnv.com [Follow on Twitter!](#) [Like on Facebook!](#)

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From: Jason M. Gerber [mailto:jgerber@maclaw.com]
Sent: Thursday, November 15, 2012 11:33 AM
To: Mike Lee
Subject: RE: Samuelian Settlement Agreement

Nope, sorry. Please delete the email and attachment.

Always open to settlement, do you have a number in mind?

From: Mike Lee [<mailto:mike@mblnv.com>]
Sent: Thursday, November 15, 2012 11:28 AM
To: Jason M. Gerber
Subject: RE: Samuelian Settlement Agreement

Did you mean to send this to me? Maybe it's wishful thinking that we can resolve the Global Accents case. ☺

MICHAEL B. LEE, ESQ.



2000 So. Eastern Avenue, Las Vegas, NV 89104
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From: Jason M. Gerber [<mailto:jgerber@maclaw.com>]
Sent: Thursday, November 15, 2012 10:35 AM
To: Mike Lee
Subject: Samuelian Settlement Agreement



Jason M. Gerber, Esq.

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Las Vegas, NV 89145
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EXHIBIT E

EXHIBIT E

Post-Judgment Interest Calculator

This calculator will help you to estimate the interest earned on a court awarded judgment.

Original judgment amount:

49510.80

Judgment date [month] [day] [4-digit year]:

03 26 2010

Annual interest rate (%):

5.25

Compute

Reset

Interest per day:

\$7.1214

Number of days since judgment date:

1383

Total interest accumulated since judgment date:

\$9,848.92

Total current value of judgment:

\$59,359.72

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